

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States District Court
Southern District of Texas
FILED

MAY 28 2008

Michael N. Milby, Clerk

UNITED STATES OF AMERICA

VS.

1. PEDRO GIL III, aka Master P, aka PG, aka Carwash,
2. DANIEL AVILA,
3. MARK BARRERA,
4. CHRISTOPHER CASTANEDA, aka PJ,
5. MARINO DURAN,
6. RAUL GARCIA, aka Flaco,
7. MANUEL BERNARD HARRIS, aka Black,
8. JUAN MANUEL HERNANDEZ, aka Meme,
9. BENJAMIN LEAL, aka Benny, aka Primo,
10. ALBERT LERMA, aka Gas,
11. JOE BRIAN MARTINEZ, aka Turtle,
12. ROBERT LUIS NARVAEZ, aka Tato,
13. ROBERTO NAVARRETE Jr.,
14. MARVYN RAMDEEN, aka Black, aka Marv,
15. JUAN JOSE RAMIREZ, aka T-Bone,
16. ERIC LEE RODRIGUEZ, aka Buckwheat,
17. TERRANCE ROBINSON, aka Monster,
18. PACINO SANMIGUEL, aka P, aka Pedro,
19. ROBERTO SANCHEZ, Jr., aka Camaron,
20. MARK URDIALEZ,
21. BRIAN MICHAEL WASHINGTON,
22. ALMA GIL, aka Alma Ancira,
23. MARIA D. PADILLA ANCIRA,
24. LORENA GARCIA HERNANDEZ.

H - 08 - 328

CR. NO. H-08

UNDER SEAL

INTRODUCTION

A. At all times pertinent to this Indictment, Defendants, **PEDRO GIL III, aka Master P, aka PG, aka Carwash, DANIEL AVILA, MARK BARRERA, CHRISTOPHER CASTANEDA, aka PJ, MARINO DURAN, RAUL GARCIA, aka Flaco, MANUEL BERNARD HARRIS, aka Black, JUAN MANUEL HERNANDEZ, aka Meme, BENJAMIN LEAL, aka Benny, aka Primo, ALBERT LERMA, aka Gas, JOE BRIAN MARTINEZ, aka Turtle, ROBERT LUIS NARVAEZ, aka Tato, ROBERTO NAVARRETE Jr., MARVYN RAMDEEN, aka Black, aka Marv, JUAN JOSE RAMIREZ, aka T-Bone, ERIC LEE RODRIGUEZ, aka Buckwheat, TERRANCE ROBINSON, aka Monster, PACINO SANMIGUEL, aka P, aka Pedro, ROBERTO SANCHEZ, Jr., aka Camaron, MARK URDIALEZ, BRIAN MICHAEL WASHINGTON, ALMA GIL aka Alma Ancira, MARIA D. PADILLA ANCIRA, LORENA GARCIA HERNANDEZ** were members or associates of the Los Hermanos de Pistoleros Latinos (“HPL”), a criminal prison and street gang, involved in narcotics distribution and money laundering within the Southern District of Texas.

B. The HPL was formed in the Texas Department of Criminal Justice (TDCJ) prison system in the mid-1980s by Latino inmates to protect its members from other gangs already in existence within the prison system.

C. The HPL is a highly organized group with specific rules and regulations which must be followed by each member. This set of rules, known as “The Executive Rules and Oath” insures loyalty and participation by HPL members in the criminal activities of the organization.

D. Each city and prison facility has its own leadership structure and has some autonomy from the statewide organization.

E. The HPL has a hierarchy for making decisions. HPL leadership includes titles such as Generals, Captains, Lieutenants, and Sergeants. Nonranking members are referred to as soldiers.

Individuals who are in the process of becoming HPL members are referred to as prospects. Individuals who perform work for or do business with the HPL, but are not members or prospects, are called associates.

F. The HPL has adopted a .45 caliber handgun and the letters H, P, and L as symbols for the organization. Many, but not all, HPL members have tattoos which include .45 caliber handguns tattooed along the waistline, the letters H, P, and L, and objects in the shape of "HPL."

G. HPL membership is for life, and HPL members are required to communicate with other HPL members whether incarcerated or not. As part of the requirement to maintain communication, HPL members are required to attend HPL meetings. A meeting between HPL members of a particular city is referred to as a *junta*, the Spanish word for "meeting." A meeting between HPL members from various cities is referred to as a *misa mayor*, a Spanish phrase which literally translates to "high mass."

H. Narcotics trafficking is one of the primary illegal activities the HPL organization conducts.

I. The primary purpose of the conspiracy was to make money through the sale and distribution of cocaine.

J. The ways, manners, and means by which the defendants and co-conspirators carried out the purpose of the conspiracy included, but were not limited to, the following:

1. It was part of the conspiracy that the defendants and their co-conspirators, known and unknown, would and did procure cocaine;

2. It was further part of the conspiracy that the defendants and their co-conspirators, known and unknown, would and did utilize numerous associates involved in narcotics trafficking to carry out the business of the conspiracy;

3. It was further part of the conspiracy that the defendants and their co-conspirators, known and unknown, would use houses, apartments, hotel rooms, and vehicles to aid, abet, and assist the illegal activities of the drug trafficking organization;

4. It was further part of the conspiracy that the defendants and their co-conspirators, known and unknown, would and did utilize various residences also known as "stash" locations to receive, store, wrap, package, and distribute cocaine;

5. It was further part of the conspiracy that the defendants and their co-conspirators, known and unknown, would and did use certain communication facilities such as cellular telephones to facilitate and further their drug trafficking activities;

6. It was further part of the conspiracy that the defendants and their co-conspirators, known and unknown, would exchange illegal narcotics for cash at various residences located in the Southern District of Texas.

COUNT ONE

Conspiracy to Possess with Intent to Distribute a Controlled Substance

From on or about 2001, and continuing until and including the date of this indictment, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court,

**PEDRO GIL III, aka Master P, aka PG, aka Carwash,
DANIEL AVILA,
MARK BARRERA,
CHRISTOPHER CASTANEDA, aka PJ,
MARINO DURAN,
RAUL GARCIA, aka Flaco,
MANUEL BERNARD HARRIS, aka Black,
JUAN MANUEL HERNANDEZ, aka Meme,
BENJAMIN LEAL, aka Benny, aka Primo,
ALBERT LERMA, aka Gas,
JOE BRIAN MARTINEZ, aka Turtle,
ROBERT LUIS NARVAEZ, aka Tato,
ROBERTO NAVARRETE Jr.,
MARVYN RAMDEEN, aka Black, aka Marv,
JUAN JOSE RAMIREZ, aka T-Bone,**

**ERIC LEE RODRIGUEZ, aka Buckwheat,
TERRANCE ROBINSON, aka Monster,
PACINO SANMIGUEL, aka P, aka Pedro,
ROBERTO SANCHEZ, Jr., aka Camaron,
MARK URDIALEZ,
BRIAN MICHAEL WASHINGTON,**

defendants herein, did knowingly and intentionally agree, combine, conspire, and confederate with each other, and with others known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. The overall scope of the conspiracy involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and (b)(1)(A)(ii).

COUNT TWO

Aiding and Abetting Possession with Intent to Distribute a Controlled Substance

On or about May 3, 2004, in the Southern District of Texas, and elsewhere,

**PEDRO GIL III, aka Master P, aka PG, aka Carwash,
MANUEL BERNARD HARRIS, aka Black,
BENJAMIN LEAL, aka Benny, aka Primo,**

defendants herein, aiding, abetting, and assisting each other and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii) and Title 18, United States Code, Section 2.

COUNT THREE

Possession with Intent to Distribute a Controlled Substance

On or about February 7, 2007, in the Southern District of Texas, and elsewhere,

MARVYN RAMDEEN, aka Black, aka Marv,

defendant herein, did knowingly and intentionally possess with the intent to distribute a controlled substance. This violation involved less than 500 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

Aiding and Abetting Possession with Intent to Distribute a Controlled Substance

On or about April 15, 2007, in the Southern District of Texas, and elsewhere,

**ALBERT LERMA, aka Gas,
MARVYN RAMDEEN, aka Black, aka Marv,**

defendants herein, aiding, abetting, and assisting each other and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a controlled substance. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii) and Title 18, United States Code, Section 2.

COUNT FIVE

Aiding and Abetting Possession with Intent to Distribute a Controlled Substance

Beginning April 17, 2007, and continuing until and through April 20, 2007, in the Southern District of Texas, and elsewhere,

**PEDRO GIL III, aka Master P, aka PG, aka Carwash,
DANIEL AVILA,
JUAN MANUEL HERNANDEZ, aka Meme,
BENJAMIN LEAL, aka Benny, aka Primo,
MARVYN RAMDEEN, aka Black, aka Marv,
PACINO SANMIGUEL, aka P, aka Pedro,
ROBERTO SANCHEZ, Jr., aka Camaron,**

defendants herein, aiding, abetting, and assisting each other and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a controlled

substance. This violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii) and Title 18, United States Code, Section 2.

COUNT SIX

Aiding and Abetting Possession with Intent to Distribute a Controlled Substance

Beginning April 24, 2007, and continuing until and through April 26, 2007, in the Southern District of Texas, and elsewhere,

**PEDRO GIL III, aka Master P, aka PG, aka Carwash,
BENJAMIN LEAL, aka Benny, aka Primo,
ROBERT LUIS NARVAEZ, aka Tato,
MARVYN RAMDEEN, aka Black, aka Marv,
ALBERT LERMA, aka Gas,
PACINO SANMIGUEL, aka P, aka Pedro,**

defendants herein, aiding, abetting, and assisting each other and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii) and Title 18, United States Code, Section 2.

COUNT SEVEN

Aiding and Abetting Possession with Intent to Distribute a Controlled Substance

On or about May 1, 2007, in the Southern District of Texas, and elsewhere,

**PEDRO GIL III, aka Master P, aka PG, aka Carwash,
JUAN MANUEL HERNANDEZ,
ALBERT LERMA, aka Gas,
ROBERT LUIS NARVAEZ, aka Tato,
MARVYN RAMDEEN, aka Black, aka Marv,
PACINO SANMIGUEL, aka P, aka Pedro,**

defendants herein, aiding, abetting, and assisting each other and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii) and Title 18, United States Code, Section 2.

COUNT EIGHT

Aiding and Abetting Possession with Intent to Distribute a Controlled Substance

Beginning on or about July 17, 2007, and continuing through July 20, 2007, in the Southern District of Texas, and elsewhere,

**MARK BARRERA,
CHRISTOPHER CASTANEDA, aka PJ,
JOE BRIAN MARTINEZ, aka Turtle,
ROBERTO NAVARRETE Jr.,
MARVYN RAMDEEN, aka Black, aka Marv,
JUAN JOSE RAMIREZ, aka T-Bone,
ERIC LEE RODRIGUEZ, aka Buckwheat,
MARK URDIALEZ,**

defendants herein, aiding, abetting, and assisting each other and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a controlled substance. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii) and Title 18, United States Code, Section 2.

COUNT NINE

Aiding and Abetting Possession with Intent to Distribute a Controlled Substance

On or about July 23, 2007, in the Southern District of Texas, and elsewhere,

**MARINO DURAN
MARVYN RAMDEEN, aka Black, aka Marv,**

defendants herein, aiding, abetting, and assisting each other and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a controlled substance. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii) and Title 18, United States Code, Section 2.

COUNT TEN

Aiding and Abetting Possession with Intent to Distribute a Controlled Substance

On or about July 24, 2007, in the Southern District of Texas, and elsewhere,

**MARVYN RAMDEEN, aka Black, aka Marv,
TERRANCE ROBINSON, aka Monster,
BRIAN MICHAEL WASHINGTON,**

defendants herein, aiding, abetting, and assisting each other and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a controlled substance. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii) and Title 18, United States Code, Section 2.

COUNT ELEVEN

Aiding and Abetting Possession with Intent to Distribute a Controlled Substance

On or about July 28, 2007, in the Southern District of Texas, and elsewhere,

**MARVYN RAMDEEN, aka Black, aka Marv,
TERRANCE ROBINSON, aka Monster**

defendants herein, aiding, abetting, and assisting each other and others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 500 grams or more of a mixture and substance containing a

detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii) and Title 18, United States Code, Section 2.

COUNT TWELVE

Conspiracy to Commit Money Laundering

Beginning on or about 2001 and continuing through the date of this indictment, in the Southern District of Texas, and elsewhere,

**PEDRO GIL III, aka Master P, aka PG, aka Carwash,
MANUEL BERNARD HARRIS, aka Black,
MARVYN RAMDEEN, aka Marv, aka Black,
PACINO SANMIGUEL, aka P, aka Pedro,
BENJAMIN LEAL aka Benny aka Primo,
DANIEL AVILA, aka Danny,
ROBERTO SANCHEZ, aka Camaron,
RAUL GARCIA, aka Flaco
ALMA GIL, aka Alma Ancira,
MARIA D. PADILLA ANCIRA,
LORENA GARCIA HERNANDEZ,**

did knowingly and intentionally conspire and agree together and with each other, and with others known and unknown to the Grand Jury, to commit certain offenses against the United States, to wit:

1. To knowingly conduct and attempt to conduct a financial transaction, the activities of which affect interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, drug trafficking, as described in this indictment, in violation of Title 21, United States Code, Sections 846, and 841(a)(1), with the intent to promote the carrying on of said specified unlawful activity, and knowing that the property involved in the financial transaction, represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(I).

2. To knowingly conduct and attempt to conduct a financial transaction, the activities

of which affect interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, drug trafficking, as described in this Indictment, in violation of Title 21, United States Code, Sections 846, and 841(a)(1), knowing that the transaction was designed in whole or in part to conceal and disguise the nature, ownership, control and source of the proceeds of the specified unlawful activity, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(I).

3. To knowingly conduct and attempt to conduct a financial transaction, the activities of which affect interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, drug trafficking, as described in this Indictment, in violation of Title 21, United States Code, Sections 846, and 841(a)(1), knowing that the transaction was designed in whole or in part to avoid a transaction reporting requirement under State or Federal Law and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii), in violation of Title 18, United States Code Section 1956(h).

MANNER AND MEANS

1. It was part of the conspiracy that the defendants, who were either members of the “HPL,” “HPL” prospects, or associates would and did procure cocaine from Mexico and elsewhere to be imported into the United States.

2. It was further part of the conspiracy that defendants, members of the “HPL,” “HPL” prospects, or associates coordinated the acquisition and distribution of bulk quantities of cocaine from Mexico to Laredo, Texas, Houston, Texas and elsewhere.

3. It was further part of the conspiracy that the defendants, members of the “HPL,” “HPL” prospects, or associates would and did use certain communication facilities such as cellular

telephones and vehicles, homes, businesses and financial institutions to facilitate and further their cocaine trafficking and money laundering activities.

4. It was further part of the conspiracy that the defendants, members of the "HPL," "HPL" prospects, or associates would and did use various residences and businesses located in the Laredo and Houston, Texas area to discuss their drug trafficking activities, stash cocaine, recon cocaine, count and store drug proceeds, and further their cocaine trafficking and money laundering activities.

5. It was further part of the conspiracy to illegally import into the United States from Mexico, multi-kilograms of cocaine and to transport multi-kilo quantities of cocaine by vehicles from the Laredo, Texas area to the Houston, Texas area and elsewhere.

6. It was further part of the conspiracy to collect the drug proceeds from the sale and distribution of bulk quantities of cocaine from the various drug distributors in the Houston, Texas area and elsewhere.

7. It was further part of the conspiracy to conceal the drug proceeds and transport the drug proceeds in vehicles from the Houston, Texas area and elsewhere to Laredo, Texas.

8. It was further part of the conspiracy to conceal and disguise the nature, ownership, control and source of the drug proceeds by conducting financial transactions designed to hide the true ownership and source of the proceeds.

9. It was further part of the conspiracy to use financial institutions and checking accounts to structure deposits designed to avoid transaction reporting requirements under State or Federal Law.

10. It was further part of the conspiracy to use drug proceeds to purchase real estate, vehicles, designer items, jewelry, airline tickets, and numerous other services and personal items.

OVERT ACTS

In furtherance of this conspiracy, and to effect and accomplish the objects of the conspiracy, one or more of the defendants or co-conspirators, both indicted and unindicted, and other persons known and unknown to the Grand Jury, performed or caused the performance of certain overt acts in the Southern District of Texas and elsewhere, including but not limited to the following;

1. On September 14, 2001, **Daniel Avila** stored approximately \$45,000.00 in United States currency at his residence in Laredo, Texas.
2. From on or about 2001 to November 2003, **Pedro and Alma Gil** made multiple cash deposits into their joint checking account at Laredo National Bank.
3. From on or about 2001 to 2002, **Pedro and Alma Gil** deposited an aggregate amount of \$216,510.00 in United States currency into their joint checking account.
4. From on or about 2001 through 2003, **Pedro and Alma Gil** spent the currency deposited into their joint Laredo National Bank checking account to pay their expenses.
5. On or about May 2003, **Pedro Gil III and Benjamin Leal** met with Houston HPL members and associates and agreed to supply them with multi-kilo quantities of cocaine for approximately \$14,500.00 per kilogram.
6. From on or about May 2003 through May 2004, **Benjamin Leal** transported multi-kilo quantities of cocaine from Laredo, Texas to an apartment located at 616 Memorial Heights in Houston, Texas.
7. From on or about May 2003 through May 2004, **Benjamin Leal** transported currency representing drug proceeds from the Houston, Texas area to Laredo, Texas.
8. From on or about May 2003 through May 2004, **Daniel Avila** transported multi-kilo quantities of cocaine from Laredo, Texas to an apartment located at 616 Memorial Heights in Houston, Texas.

9. From on or about May 2003 through May 2004, **Daniel Avila** transported thousands of dollars in United States currency from the Houston, Texas area to Laredo, Texas.
10. From on or about May 2003 through May 2004, **Manuel Bernard Harris aka Black** received in Houston, Texas multi-kilo quantities of cocaine from **Pedro Gil III** and his associates.
11. From on or about May 2003 through May 2004, **Manuel Bernard Harris aka Black** delivered United States currency to **Pedro Gil III's** associates.
12. From on or about May 2003 through May 2004, **Pedro Gil III, Daniel Avila, and Benjamin Leal** transported an aggregate amount of approximately four million dollars from Houston to Laredo, Texas.
13. On or about January through November 2003, **Pedro and Alma Gil** deposited an aggregate amount of approximately \$99,000.00 cash into their joint Laredo National Bank Checking Account.
14. From on or about January 2003, through November 2003, **Pedro and Alma Gil** used the currency deposited into their joint checking account at Laredo National Bank to pay for their expenses.
15. On September 3, 2003, **Maria Padilla Ancira** opened a personal checking account at Laredo National Bank.
16. On November 4, 2003, **Alma Gil** opened a personal checking account at Laredo National Bank in her name only.
17. From on or about 2003 through 2004, **Alma Gil** deposited an aggregate amount of approximately \$302,400.00 into her checking account at the Laredo National Bank.
18. From on or about November 2003 through December 2004 **Alma Gil** used the monies deposited into her Laredo National Bank checking account to pay for expenses.

19. From on or about 2003 through 2004, **Maria Padilla Ancira** deposited an aggregate amount of approximately \$50,400.00 United States currency into her checking account at the Laredo National Bank.

20. From on or about September 2003 through December 2004, **Maria Padilla Ancira** used the monies deposited into her checking account at the Laredo National Bank to pay for expenses of **Pedro Gil III and Alma Gil**.

21. From on or about January 2005 through December 2005 **Alma Gil** deposited an aggregate amount of approximately \$268,880.00 into the Laredo National Bank Checking Account of Alma Gil.

22. Between January 2005 through December 2005 **Alma Gil**, used the monies deposited into her Laredo National Bank checking account to pay for the expenses of **Pedro Gil III and Alma Gil**.

23. From on or about January 2005 through December 2005 **Maria Padilla Ancira** deposited an aggregate amount of approximately \$146,540.00 into her Laredo National Bank Checking Account.

24. Between January 2005 through December 2005 **Maria Padilla Ancira** used the monies deposited into her Laredo National Bank checking account to pay for expenses of **Pedro Gil III and Alma Gil**.

25. On or about June 28, 2005, **Lorena Garcia Hernandez** opened a personal checking account at International Bank of Commerce.

26. Between June 28, 2005, and 2006, **Lorena Garcia Hernandez** made cash deposits in an aggregate amount of \$202,970.00 into her International Bank of Commerce checking account.

27. Between June 28, 2005, and 2006, **Lorena Garcia Hernandez** used the monies

deposited into her International Bank of Commerce checking account to pay for expenses of **Pedro Gil III** and **Alma Gil**.

28. From on or about January 2006, through December 2006, **Alma Gil** deposited an aggregate amount of approximately \$256,440.00 into her Laredo National Bank Checking Account.

29. From on or about January 2006, through December 2006, **Maria Padilla Ancira** deposited an aggregate amount of approximately \$300,940.00 into her Laredo National Bank Checking Account.

30. Between January 2006, through December 2006, **Maria Padilla Ancira** used the monies deposited into her Laredo National Bank checking account to pay for expenses of **Pedro Gil III** and **Alma Gil**.

31. From on or about January 2006, through December 2006, **Maria Padilla Ancira** conducted numerous financial transactions using drug proceeds deposited into her Laredo National Bank checking account to pay for expenses of **Pedro Gil III** and **Alma Gil**.

32. From on or about January 2006, through December 2006, **Alma Gil** conducted numerous financial transactions using drug proceeds deposited into her Laredo National Bank checking account to pay for expenses of **Pedro Gil III** and **Alma Gil**.

33. On or about March 13, 2007, **Roberto Sanchez, Jr., aka Camaron**, agreed to talk to **Pedro Gil III** regarding supplying Houston HPL members with cocaine.

34. On or about March 31, 2007, **Roberto Sanchez, aka Camaron**, met with Houston HPL members in person and discussed contacting **Pedro Gil III** about supplying Houston HPL members with cocaine.

35. On or about April 12, 2007, **Pedro Gil III** agreed to meet with Houston HPL members **Pacino Sanmiguel** and **Marvyn Ramdeen** in Laredo, Texas to discuss supplying them with cocaine.

36. On or about April 17, 2007, **Pacino Sanmiguel** and other Houston HPL members traveled from Houston to Laredo, Texas to meet with **Pedro Gil III** regarding supplying them with cocaine.

37. On April 17, 2007, **Pacino Sanmiguel** called **Roberto Sanchez, aka Camaron**, upon their arrival to Laredo, Texas and **Roberto Sanchez, aka Camaron**, contacted **Pedro Gil III** to advise of their arrival.

38. On April 17, 2007, **Pedro Gil III** instructed **Roberto Sanchez, aka Camaron**, to take **Pacino Sanmiguel** and others to 1904 Lexington, Laredo, Texas to meet to discuss the cocaine deal.

39. On April 17, 2007, **Roberto Sanchez, aka Camaron**, escorted **Pacino Sanmiguel** and others to 1904 Lexington, Laredo, Texas to meet with **Pedro Gil III**

40. On April 17, 2007, **Daniel Avila** drove **Pedro Gil III** to 1904 Lexington, Laredo, Texas to meet with **Pacino Sanmiguel** and others to discuss a cocaine deal.

41. On April 17, 2007, **Pedro Gil III, Daniel Avila, Pacino Sanmiguel**, and others attended and participated at a meeting at 1904 Lexington, Laredo, Texas to discuss Gil's distribution of cocaine from Laredo to Houston for Houston HPL members.

42. On April 17, 2007, **Pedro Gil III** reached an agreement with **Pacino Sanmiguel** to supply Houston HPL members **Pacino Sanmiguel** and **Marvyn Ramdeen** with multi-kilo quantities of cocaine for \$14,600.00 per kilogram.

43. On April 17, 2007, **Pedro Gil III** instructed **Pacino Sanmiguel** that **Danny Avila** will be the point of contact for any and all future dealings pertaining to their cocaine negotiations.

44. On April 17, 2007, **Daniel Avila** agreed to be the point of contact for **Pedro Gil III's** cocaine dealings with **Pacino Sanmiguel** and exchanged telephone numbers with **Pacino Sanmiguel**.

45. On April 17, 2007, **Pedro Gil III** contacted **Benny Leal** and advised him to be ready to take a load of cocaine to Houston the next morning.
46. On April 18, 2007, **Benjamin Leal** transported ten kilograms of cocaine from Laredo to Houston, Texas and then returned to Laredo .
47. On April 18, 2007, **Pacino Sanmiguel** received ten kilograms of cocaine from **Pedro Gil III** via **Benjamin Leal** in Houston, Texas.
48. On April 18, 2007, **Marvyn Ramdeen** instructed another to transport ten kilograms of cocaine from **Pacino Sanmiguel's** house to 1430 Pearson, Houston, Texas.
49. Between April 18-20, 2007, **Marvyn Ramdeen** and others distributed ten kilograms of cocaine in the Houston, Texas area and collected drug proceeds from the sale of the cocaine.
50. On April 20, 2007, **Benjamin Leal** traveled to Houston from Laredo, Texas to collect the proceeds of the ten kilograms of cocaine delivered on April 18, 2007.
51. On April 20, 2007, **Marvyn Ramdeen** and others counted and packaged drug proceeds at 4611 Park, Houston, Texas (**Ramdeen's** residence), which were proceeds to be delivered to **Benjamin Leal** for the ten kilograms of cocaine delivered on April 18, 2007.
52. On April 20, 2007, **Marvyn Ramdeen** had another HPL member deliver an ice chest containing approximately \$143,600.00 dollars in drug proceeds to **Pacino Sanmiguel** at Bloodline Tattoos in Houston, Texas.
53. On April 20, 2007, **Pacino Sanmiguel** delivered drug proceeds in the approximate amount of \$143,600.00 dollars to **Benjamin Leal** for transportation from Houston to Laredo, Texas.
54. On April 20, 2007, **Benjamin Leal** transported drug proceeds in the approximate amount of \$143,000.00 from Houston to Laredo, Texas for delivery to **Pedro Gil III**.
55. On April 24, 2007, **Benjamin Leal** transported ten kilograms of cocaine for **Pedro Gil III** from Laredo, Texas to Houston, Texas and returned to Laredo, Texas.

56. On April 24, 2007, **Pacino Sanmiguel** received ten kilograms of cocaine from **Pedro Gil III** via **Benjamin Leal** in Houston, Texas.
57. On April 24, 2007, **Marvyn Ramdeen** instructed a HPL member to transport the ten kilograms of cocaine from **Pacino Sanmiguel's** house to 1430 Pearson, Houston, Texas (**Ramdeen's** stash house).
58. Between April 24-25, 2007, **Marvyn Ramdeen** and others distributed ten kilograms of cocaine in the Houston, Texas area and collected drug proceeds from the sale of the cocaine.
59. On April 25, 2007, **Benjamin Leal** traveled to Houston from Laredo, Texas to collect drug proceeds for the ten kilograms of cocaine delivered on April 24, 2007.
60. On April 25, 2007, **Marvyn Ramdeen** and others counted and packaged drug proceeds at 4611 Park, Houston, Texas (**Ramdeen's** residence), which were proceeds to be delivered to **Benjamin Leal** for ten kilograms of cocaine delivered on April 24, 2007.
61. On April 25, 2007, **Marvyn Ramdeen** had another HPL member deliver approximately \$148,400.00 dollars in drug proceeds to **Pacino Sanmiguel**.
62. On April 25, 2007, **Pacino Sanmiguel** delivered drug proceeds in the approximate amount of \$148,400.00 dollars to **Benjamin Leal** for transportation from Houston to Laredo, Texas.
63. On April 25, 2007, **Benjamin Leal** transported drug proceeds in the approximate amount of \$148,400.00 from Houston to Laredo, Texas.
64. On May 1, 2007, **Benjamin Leal** transported twenty kilograms of cocaine from Laredo to Houston, Texas.
65. On May 1, 2007, **Pacino Sanmiguel** received twenty kilograms of cocaine from **Pedro Gil III** via **Benjamin Leal** in Houston, Texas.
66. On May 1, 2007, **Marvyn Ramdeen** instructed another to transport the twenty kilograms of cocaine from **Pacino Sanmiguel's** house to 1430 Pearson (**Ramdeen's** stash house).

67. On May 1, 2007, **Marvyn Ramdeen** and others distributed part of the twenty kilograms of cocaine delivered by **Benjamin Leal**.

68. From on or about May 1, 2007 to July 17, 2007, **Marvyn Ramdeen** and **Pacino Sanmiguel** made a partial payment of \$30,000.00 to **Pedro Gil III** for the twenty kilograms of cocaine delivered on May 1, 2007.

69. On July 17, 2007, **Roberto Sanchez, aka Camaron**, called **Marvyn Ramdeen** to advise that **Pedro Gil III** was trying to reach him regarding monies owed for a cocaine delivery.

70. On July 17, 2007, **Pedro Gil III** demanded payment of at least \$40,000.00 from **Marvyn Ramdeen** of monies owed for the May 1, 2007, delivery of twenty kilograms of cocaine.

71. On July 17, 2007, **Marvyn Ramdeen** called **Pacino Sanmiguel** to relate the message from **Pedro Gil III** regarding sending someone to collect drug proceeds still owed.

72. On July 27, 2007, **Roberto Sanchez, aka Camaron**, called **Marvyn Ramdeen** and stated that **Pedro Gil III** had been trying to reach **Pacino Sanmiguel** to determine how much drug proceeds had been collected for **Pedro Gil III**.

73. On July 27, 2007, **Marvyn Ramdeen** called **Pacino Sanmiguel** to discuss how much money they should pay **Pedro Gil III** on money owed for drugs and agreed to make another \$30,000.00 payment.

74. On July 29, 2007, **Raul Garcia, aka Flaco**, called **Marvyn Ramdeen** and told him that they were traveling to Houston in order to collect a \$30,000.00 payment for **Pedro Gil III**.

75. On July 29, 2007, **Raul Garcia, aka Flaco**, asked **Marvyn Ramdeen** to wire him \$500.00 for travel expenses because **Pedro Gil III** was out of town.

76. On July 29, 2007, **Marvyn Ramdeen** wired \$500.00 from Houston, Texas, via Western Union to **Raul Garcia, aka Flaco**, in Laredo, Texas.

77. On July 29, 2007, **Raul Garcia, aka Flaco**, received the \$500.00 dollars wired by **Marvyn Ramdeen**, in the name of Marvyn Romero, from Houston, Texas in Laredo, Texas.
78. On July 29, 2007, **Raul Garcia, aka Flaco**, traveled from Laredo to Houston, Texas to collect drug proceeds for **Pedro Gil III**.
79. On July 29, 2007, **Roberto Sanchez, aka Camaron**, traveled from Laredo to Houston, Texas to collect drug proceeds for **Pedro Gil III**.
80. On July 30, 2007, **Roberto Sanchez, aka Camaron, and Raul Garcia, aka Flaco**, used drug proceeds to pay for their hotel rooms in Houston, Texas.
81. On August 1, 2007, **Pacino Sanmiguel and Marvyn Ramdeen** delivered cash drug proceeds in the amount of \$28,000.00 to **Raul Garcia, aka Flaco**.
82. On August 2, 2007, **Raul Garcia, aka Flaco, and Roberto Sanchez, aka Camaron**, transported \$28,000.00 cash in drug proceeds from Houston intending to deliver the drug proceeds to **Pedro Gil III**.
83. From on or about January 2007 through December 2007, **Alma Gil** deposited an aggregate amount of approximately \$299,600.00 cash in drug proceeds into the Laredo National Bank Checking Account of **Alma Gil**.
84. From on or about January 2007 through December 2007, **Maria Padilla Ancira** deposited an aggregate amount of approximately \$287,960.00 cash in drug proceeds into the Laredo National Bank Checking Account under the name of **Maria Padilla Ancira**.
85. From on or about January 2007 through December 2007, **Maria Padilla Ancira** withdrew monies deposited into her Laredo National Bank checking account to pay for the expenses of **Pedro Gil III and Alma Gil**.

86. From on or about January 2007 through December 2007, **Alma Gil** withdrew monies deposited into her Laredo National Bank checking account to pay for the expenses of **Pedro Gil III** and **Alma Gil**.

The Grand Jury specifically re-alleges and adopts by reference each and every allegation contained in this indictment, in violation of Title 18, United States Code Section 1956(h).

NOTICE OF CRIMINAL FORFEITURE

(21 U.S.C. § 853 and 18 U.S.C. § 982)

Pursuant to 21 U.S.C. § 853, as a result of the commission of a violation of 21 U.S.C. § 841 and § 846 as alleged in this indictment, and pursuant to 18 U.S.C. § 982, as a result of the commission of a violation of 18 U.S.C. § 1956 and § 1957, notice is given to Defendants:

PEDRO GIL III (Counts 1, 2, 5, 6, 7, 12)
DANIEL AVILA (Counts 1, 5, 12)
MARK BARRERA (Counts 1, 8)
CHRISTOPHER CASTANEDA (Counts 1, 8)
MARINO DURAN (Counts 1, 9)
RAUL GARCIA (Counts 1, 12)
MANUEL BERNARD HARRIS (Counts 1, 2, 12)
JUAN MANUEL HERNANDEZ (Counts 1, 5, 7)
BENJAMIN LEAL (Counts 1, 2, 5, 6, 12)
ALBERT LERMA (Counts 1, 4, 6, 7)
JOE BRIAN MARTINEZ (Counts 1, 8)
ROBERT LUIS NARVAEZ (Counts 1, 6, 7)
ROBERTO NAVARRETE Jr. (Counts 1, 8)
MARVYN RAMDEEN (Counts 1, 3-12)
JUAN JOSE RAMIREZ (Counts 1, 8)
ERIC LEE RODRIGUEZ (Counts 1, 8)
TERRANCE ROBINSON (Counts 1, 10, 11)
PACINO SANMIGUEL (Counts 1, 5, 6, 7, 12)
ROBERTO SANCHEZ, JR. (Counts 1, 5, 12)
MARK URDIALEZ (Counts 1, 8)
BRIAN MICHAEL WASHINGTON (Counts 1, 10)
ALMA GIL (Count 12)
MARIA D. PADILLA ANCIRA (Count 12)
LORENA GARCIA HERNANDEZ (Count 12)

that in the event of conviction, the United States will seek the forfeiture of the following property:

- a) all property constituting, or derived from, any proceeds, and obtained, directly or indirectly, as the result of the violations charged in Counts One through Eleven, including conspiracy;
- b) all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations charged in Counts One through Eleven, including conspiracy; and
- c) all property involved in the commission of the offenses charged in Count Twelve, including conspiracy.

The property subject to forfeiture under this notice includes, but is not limited to, the following property:

- 1. Approximately \$6,000,000.00 United States currency;
- 2. The real property located at 1902 Lexington, Laredo, Texas, and more fully described as:
Lot 5, Block 265, Eastern Division, Laredo, Webb County, Texas.

The property is titled in the name of Pedro and Alma Gil.

- 3. The real property located at 1904 Lexington, Laredo, Texas, and more fully described as:
Lot 5, Block 265, Eastern Division, Laredo, Webb County, Texas.

The property is titled in the name of Pedro and Alma Gil.

- 4. The real property located at 603 Lane, Laredo, Texas, and more fully described as:
East 13.8 of Lot 1 & the West 41.64 feet of Lot 2, Block 251, Eastern Division, Laredo, Webb County, Texas.

The property is titled in the name of Alma Gil.

- 5. The real property located at 305 Lake Louise Ct., Laredo, Texas, and more fully described as:

Lakeside Subdivision, Block 10, Lot 5, Phase 1, Laredo, Webb County, Texas.

The property is titled in the name of Alma Ancira.

6. The real property located at 2328 Jacaman Road, Laredo, Texas, and more fully described as:

Jacaman Ranch Unit 6, Jacaman Commercial Park, Block 1, Lot 5, Laredo, Webb County, Texas.

The property is titled in the name of Alma Gil.

7. The real property consisting of 80 acres, and more fully described as:

Lot 8, Block 41, Catarina Farms, Subdivision "F", Catarina, Dimmit County, Texas, duly recorded in Volume 1, page 37 and 39, Map Records, Dimmit County, Texas.

The property is titled in the name of Pedro Gil, Trustee for the minor son P.G. IV, in Trust.

8. The real property consisting of 80 acres, and more fully described as:

Lot 5, Block 154, Catarina Farms, Subdivision "H", Catarina, Dimmit County, Texas, duly recorded in Volume 1, page 37 and 39, Map Records, Dimmit County, Texas.

The property is titled in the name of Pedro Gil, Trustee for the minor son P.G. IV, in Trust.

9. The real property located at 318 Bustamante, Laredo, Webb County, Texas, and more fully described as:

Lot 7, in Block 465, Eastern Division of the City of Laredo, Webb County, Texas, as recorded in Volume 2299, Page 253, Official Public Records, Webb County, Texas.

The property is titled in the name of Alma Gil, Trustee, for the minor daughter, K.G. in Trust.

Substitute Assets

In the event that the property subject to forfeiture pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 982, as a result of any act or omission of the defendants,

- a) cannot be located upon the exercise of due diligence,
- b) has been placed beyond the jurisdiction of the Court,
- c) has been transferred or sold to, or deposited with a third party,

- d) has been substantially diminished in value, or
- e) has been commingled with other property which cannot be subdivided without difficulty,

it is intent of the United States to seek forfeiture of any other property of the Defendants up to the value of such property pursuant to 21 U.S.C. § 853 (p) and 21 U.S.C. § 982(b), incorporating by reference 21 U.S.C. § 853(p).

A TRUE BILL: /

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

DONALD J. DEGABRIELLE, JR.
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF TEXAS

By:

Mary Lou Castillo
Mary Lou Castillo
Assistant United States Attorney

Timothy S. Braley
Timothy S. Braley
Assistant United States Attorney